

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

THE CITY OF HUNTINGTON,

Plaintiff,

v.

Civil Action No. 3:17-01362

Hon. David A. Faber

AMERISOURCEBERGEN DRUG
CORPORATION, et al.

Defendants.

CABELL COUNTY COMMISSION,

Plaintiff,

v.

Civil Action No. 3:17-01665

Hon. David A. Faber

AMERISOURCEBERGEN DRUG
CORPORATION, et al.

Defendants.

AMENDED NOTICE OF REMOTE DEPOSITION OF ELLEN A. THOMPSON, M.D.

Defendant Cardinal Health, Inc., by and through counsel, hereby gives notice that the remote, oral deposition of Ellen A. Thompson, M.D., will take place on September 22, 2020, beginning at 1:00 p.m. Eastern Time. The deposition shall be videotaped and recorded stenographically and will be conducted before a notary public or other person authorized to administer oaths. Court reporting services and video recording services will be provided by Veritext Legal Solutions (216-523-1313; opioid@veritext.com), who will provide remote access for all parties wishing to participate via video conference or telephone.

PLEASE TAKE FURTHER NOTICE that the Deponent must have access to a laptop, computer, or tablet with web camera capability. Deponent may not use a cell phone to provide testimony. Deponent must also have the capability to view documents electronically. To the extent Deponent is not in possession of the required technology, documents shall be provided to the

Deponent in hard copy and/or Deponent's counsel shall provide the required technology.

Recommended Specifications are below:

- i. Computer
- ii. Web Camera
- iii. Internet Browser (Google Chrome Preferred)
- iv. Minimum 10 mb/s wired, secure internet connection

At minimum, Deponent must have sufficient internet connectivity and bandwidth to support a video deposition. Such capacity shall be sufficient to ensure that when used with the system selected for the deposition, there shall be (a) high-quality video upload (from Deponent) and download (to other Participants), (b) no material time discrepancy between audio and video, and (c) consistent connectivity, with no material disruptions.

Dated: September 17, 2020

Respectfully submitted,

/s/ Steven R. Ruby

Michael W. Carey (WVSB No. 635)

Steven R. Ruby (WVSB No. 10752)

David R. Pogue (WVSB No. 10806)

Raymond S. Franks II (WVSB No. 6523)

CAREY DOUGLAS KESSLER & RUBY PLLC

901 Chase Tower, 707 Virginia Street, East

P.O. Box 913

Charleston, WV 25323

Telephone: (304) 345-1234

Facsimile: (304) 342-1105

mwcarey@csdlawfirm.com

sruby@cdkrlaw.com

drpogue@csdlawfirm.com

rfranks@cdkrlaw.com

Counsel for Cardinal Health, Inc.

Enu Mainigi
F. Lane Heard III
Ashley W. Hardin
Jennifer G. Wicht
WILLIAMS & CONNOLLY LLP
725 Twelfth Street NW
Washington, DC 20005
Telephone: (202) 434-5000
Facsimile: (202) 434-5029
emainigi@wc.com
lheard@wc.com
ahardin@wc.com
jwicht@wc.com
Counsel for Cardinal Health, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 17th day of September, 2020, the foregoing “Amended Notice of Remote Deposition of Ellen A. Thompson, M.D.” was served using the Court’s CM/ECF system, which will send notification of such filing to all counsel of record, and via electronic mail to mdl2804discovery@motleyrice.com and track2opioiddefendants@reedsmith.com.

Dated: September 17, 2020

/s/ Steven R. Ruby
Steven R. Ruby (WVSB No. 10752)